

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:		)	Chapter 11
		)	
CELSIUS NETWORK LLC, <i>et al.</i> , <sup>1</sup>		)	Case No. 22-10964 (MG)
		)	
Debtors.		)	(Jointly Administered)
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FRED M SHANKS,		)	
		)	
	Plaintiff,	)	Adversary Proceeding No. 22-01190 (MG)
v.		)	
		)	
CELSIUS NETWORK LLC;		)	
CELSIUS KEYFI LLC;		)	
CELSIUS LENDING LLC;		)	
CELSIUS MINING LLC;		)	
CELSIUS NETWORK INC.;		)	
CELSIUS NETWORK LIMITED;		)	
CELSIUS NETWORKS LENDING LLC;		)	
and CELSIUS US HOLDING LLC,		)	
		)	
Defendants.		)	
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**JOINT STIPULATION AND AGREED ORDER BY AND AMONG THE  
DEBTORS AND FRED M. SHANKS REGARDING DEBTORS' TIME TO RESPOND  
TO MR. SHANKS' COMPLAINT**

This Joint Stipulation and Agreed Order (this "Stipulation") is made and entered into by and among: (a) Celsius Network LLC, and certain of its subsidiaries and affiliates, as debtors in

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); and Celsius US Holding LLC (7956). The location of Debtor Celsius Network LLC's principal place of business and the Debtors' service address in these chapter 11 cases is 121 River Street, PH05, Hoboken, New Jersey 07030.

possession in the above-captioned chapter 11 cases (the “Debtors”); and (b) Fred M. Shanks (together with the Debtors, the “Parties”). The Parties hereby stipulate and agree as follows:

**RECITALS**

**WHEREAS**, on December 20, 2022, Mr. Shanks filed his *Complaint against Celsius Network LLC, ET AL, Celsius Network LLC, Celsius Keyfi LLC, Celsius Lending LLC, Celsius Mining LLC, Celsius Network Inc., Celsius Network Limited, Celsius Networks Lending LLC, Celsius US Holding LLC* [Docket No. 1765] (the “Adversary Complaint”);

**WHEREAS**, on January 7, 2023, Mr. Shanks filed his *Amended Complaint Against All Defendants* [Adv. Pro. No. 22-01190, Docket No. 8] (the “Amended Adversary Complaint”);

**WHEREAS**, the Parties met and conferred and have agreed to stipulate to extending the deadline for Debtors to file any responsive pleading to the Amended Adversary Complaint.

**NOW, THEREFORE, IT IS STIPULATED AND AGREED AND, UPON APPROVAL BY THE BANKRUPTCY COURT OF THIS STIPULATION, IT IS SO ORDERED AS FOLLOWS:**

1. The foregoing recitals are incorporated herein by reference.
2. The Parties agree that the Debtors’ deadline to respond to the Amended Adversary Complaint is extended to 30 days following the entry of an Order regarding this Stipulation.

**IT IS SO ORDERED.**

New York, New York  
Dated: \_\_\_\_\_, 2023

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THE HONORABLE MARTIN GLENN  
CHIEF UNITED STATES BANKRUPTCY JUDGE

STIPULATED AND AGREED TO THIS 13th DAY OF JANUARY, 2023:

Washington, D.C.  
Dated: January 13, 2023

/s/ Judson Brown, P.C.

**KIRKLAND & ELLIS LLP**

**KIRKLAND & ELLIS INTERNATIONAL LLP**

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*Debtors in Possession*

/s/ Fred M. Shanks

Fred M. Shanks

*Pro Se Creditor*